

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IN RE: DAIRY FARMERS OF AMERICA,	)	
INC. CHEESE ANTITRUST LITIGATION	)	Master File No. 09-cv-03690
	)	MDL No. 2031
THIS DOCUMENT RELATES TO:	)	Judge Robert M. Dow, Jr.
	)	Magistrate Judge Maria Valdez
DIRECT PURCHASER ACTION	)	
	)	

**LEAD COUNSEL’S PETITION FOR AN AWARD OF  
ATTORNEYS’ FEES AND REIMBURSEMENT OF EXPENSES**

Lead Counsel for the Direct Purchaser Plaintiffs respectfully petition the Court for (a) an award of attorneys’ fees to Class Counsel for their professional services rendered in creating the substantial benefits provided to the Class by the settlement with the Dairy Farmers of America, Inc. Keller’s Creamery LP, Keller’s Creamery, LLC, Keller’s Creamery Management, LLC, Gary Hanman, Gerald Bos, Frank Otis, and Glenn Millar (collectively the “DFA Defendants”), and (b) reimbursement of Class Counsel’s expenses reasonably incurred in connection with the claims against the DFA Defendants. Specifically, Lead Counsel requests an award to Class Counsel of attorneys’ fees in the amount of one-third of the \$46,000,000 common fund (or \$15,333,333.33) and reimbursement of expenses reasonably incurred in the amount of \$488,491.24.

In support of this motion, the Lead Counsel relies on *Direct Purchaser Plaintiffs’ Memorandum in Support of Lead Counsel’s Petition for Award of Attorneys’ Fees and Reimbursement of Expenses* (Dkt. No. 609), the *Declaration of Christopher M. McGrath in Support of Lead Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Expenses* (Dkt. No. 611), and the *Direct Purchaser Plaintiffs’ Memorandum in Support of Motion for Final Approval of Class Action Settlement* (Dkt. No. 607), all filed on July 20, 2014.

WHEREFORE, Lead Counsel respectfully requests (a) that the Court award attorneys' fees equal to one-third of the \$46,000,000 common fund, or \$15,333,333.33 and (b) reimbursement of expenses reasonably incurred in the amount of \$488,491.24.

Dated: July 21, 2014

Respectfully submitted,

/s/ Christopher Lovell

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